

## **CG Slate User Privacy Policy**

Last modified on: July 5<sup>th</sup>, 2023.

### **1. BACKGROUND**

- A. CG Slate is provided to the User under these CG Slate User Terms of Service (“**Terms**”) and this CG Slate User Privacy Policy (“**Privacy Policy**”). You in these Terms refer to the User and/or on behalf of Child User as defined in the Terms and the Privacy Policy, therein.
- B. CG Slate and the Company understand and recognize your right to confidentiality and is committed to protecting and preserving your privacy. Pursuant to such commitment, CG Slate has developed this Privacy Policy for the handling of or for dealing with your and/or a Child User’s Information, as defined and provided hereunder.
- C. This Privacy Policy applies to all the Services offered under CG Slate unless specified otherwise. Please also read Terms, which describe the terms under which you use and We provide the CG Slate Platform.
- D. Subject to the provisions of this Privacy Policy, the Terms and all applicable laws, CG Slate may collect, receive, store, deal in, handle and/or share Personal Information (as defined hereinafter) and Non-Personal Information (as defined hereinafter) pertaining to the Users and/or Child Users online and/or offline use of the Services. This Privacy Policy outlines the Information CG Slate may process and/or use to improve the User and/or Child User experience while using the Services.
- E. Every User (on their behalf and/or on behalf of a Child User) of the Services must be in a position to provide informed consent prior to providing any Information required for the use of the Services. You agree that by registering with us, you (on behalf of yourself and/or a Child User) consent to us collecting, receiving, storing, possessing, dealing with, sharing and/or handling your and/or a Child User’s Information in accordance with the terms of this Privacy Policy. Accordingly, you are required to read and understand this Privacy Policy, the Terms and any such other terms and conditions as may be applicable to your and/or a Child User’s use of the Services, before submitting any Information. Please note that your and/or a Child User’s access to the Services is conditional upon your consenting to this Privacy Policy. Please further note that if you are a Child User, please immediately stop using the Services until your parent or legal guardian approves and consents to the usage of the Services in accordance with the Privacy Policy and the applicable terms and conditions relating to use of the Services.

### **2. INFORMATION YOU PROVIDE**

- A. Your Account Information: You must provide your mobile phone number and basic information (including a profile name of Your choice) to register as a User on CG Slate. If you don’t provide Us with this Information, you will not be able to register yourself as a User and use CG Slate. You can add other information to your profile, such as a profile picture and "about" information.
- B. User Support and Other Communications: When you contact Us for support or otherwise communicate with Us, you may provide Us with information related to Your use of CG Slate, and any other Information you deem helpful, and how to contact you (e.g., an email address). For example, you may send Us an email with information relating to CG Slate performance or other issues.

- C. Direct marketing and opting out: When registering as a User and/on behalf of a Child User, you may choose to receive promotional or marketing information from CG Slate by selecting the appropriate option on the registration page. In that case, from time to time we may use your Personal Information to inform you about CG Slate's products or services or about promotional activities which CG Slate believes may be of interest or of benefit to you. We may do this via email, SMS, telephone, or mail. If you no longer wish to receive marketing or promotional material from CG Slate at all or in any form, you may contact us at any time by email to [hello@cgSlate.com](mailto:hello@cgSlate.com) with your request with which we will comply as soon as is practical. From time to time we may contact you in relation to the management and administration of your CG Slate account. These communications can be via any of the modes of contact recorded when registering as a User and/or on behalf of Child user. Such communication does not affect your opt-in or opt-out status for direct marketing communications.

### **3. AUTOMATICALLY COLLECTED INFORMATION**

- A. CG Slate obtains the Information (including Personal Information) when you and/or the Child User downloads, registers, accesses or uses any of the Services provided by CG Slate. When you register with the CG Slate Platform and/or the Child User access the Platform, you generally provide (a) your and/or a Child User's name, email address, phone number, grade, gender and location; (b) at the time of responding to any offers from us, transaction-related information; (c) information that is typically provided when you contact us for help/assistance; and (d) other information you and/or a Child User enters or uploads into our system when using the Platform. The above-mentioned information is necessary to allow the Company to operate the Platform and provide the Services to Users and/or Child Users. Without it, we may not be able to provide you and/or a Child User with all the requested Services, which could result in you and/or a Child User not being able to use the Platform (or any part thereof).
- B. We use cookies to operate and provide CG Slate, including to improve your experiences, understand how CG Slate is being used, and customize them. When you access the CG Slate Platform, cookies may record details relating to your use of the same, including what pages you view from such Platform. CG Slate does not use cookies to track your Personal Information and uses them for internal management purposes only. We may use third parties to serve ads on our Platform. These companies may employ cookies and action tags (also known as single pixel gifs or web beacons) to measure advertising effectiveness. Any information that these third parties collect via cookies and action tags is completely anonymous.

### **4. PURPOSE OF COLLECTING, STORING AND USING PERSONAL INFORMATION**

- A. CG Slate will collect your Personal Information only by lawful and fair means and not in an intrusive way to operate its business as an edutainment Platform for Child Users for the following purposes:
- if you wish to subscribe to CG Slate's Monthly newsletter;
  - to process your application to become a User of CG Slate;
  - to provide Services to you as a User and/or on behalf of Child User;
  - to identify you as a User for security purposes and to comply with our legal obligations;
  - develop, enhance and improve the Services, conduct relevant research, create internal guidelines for content creation, to suit your needs which may include market research and conducting promotions.
  - to create aggregate data anonymously about the Users through demographic profiling, statistical analysis of the database to provide to potential and existing stakeholders, and to allow for more efficient operation of CG Slate's business to determine Users' liability to pay goods and services tax and other taxes where applicable.

- to comply with CG Slate's legal and statutory obligations including in relation to customer identity verification and reporting obligations imposed by the Anti-Money Laundering and Counter Terrorism Act of any country regulatory requirement.
- for taking appropriate action if CG Slate has reason to suspect that unlawful activity or misconduct of a serious nature has been, is being or may be engaged in that relates to our functions and activities.

B. You may choose to deal with us on an anonymous basis or to use a pseudonym unless it is not practicable for Us to deal with individuals who we cannot identify, or we are required by law to only deal with identified individuals. Also, if you do not provide CG Slate with the Personal Information We request, We may be unable to process your application to become a member, provide you with Our Services or respond to your enquiry or complaint.

## **5. MANAGEMENT OF PERSONAL INFORMATION**

A. CG Slate will take all reasonable steps to ensure that the Personal Information which it collects, uses or discloses is correct and is stored in a secure environment which is accessed only by authorized persons. CG Slate will destroy or permanently de-identify the Personal Information we hold when it is no longer required for any purpose permitted under the Information Technology Act 2000 including Our legal or operational obligations.

## **6. DISCLOSURE**

A. Personal Information collected by CG Slate may be disclosed to a third party in the following circumstances:

- to provide you with the Services or support/information you have requested;
- for any other purpose related to the purposes for which your Personal Information was collected as described in this Privacy Policy which you would reasonably expect or which has been otherwise notified to you;
- the third parties or classes of third parties that CG Slate has at the time of collection informed you of;
- to enable CG Slate to participate in activities with business partners and sponsors, who will be notified to you at the time your Personal Information is collected;
- where the disclosure is required or authorized by law or otherwise permitted under the Information Technology Act, 2000;
- where you have consented to its disclosure either expressly or by the circumstances and your conduct.

B. CG Slate will take all reasonable steps to ensure that any Personal Information which CG Slate discloses to a third party is protected by that party in accordance with the Information Technology Act.

## **7. SECURITY OF PERSONAL INFORMATION**

A. You acknowledge that no data transmission over the Internet is totally secure. Accordingly, CG Slate does not warrant the security of any information which you transmit to it. Any information which you transmit to CG Slate is transmitted at your own risk. However, once CG Slate receives your transmission, CG slate will take reasonable steps to protect your Personal Information from misuse, loss and unauthorized access, modification and disclosure including by using password protected systems and databases and Secure Socket Layer ("SSL") technology. CG Slate's employees, agents and contractors are required to maintain the confidentiality of Members' Personal Information and other behaviour. Information posted on bulletin boards or communicated within a social media environment (for example, Facebook, Twitter, Chat Rooms) becomes public information. CG Slate cannot guarantee the security of this type of disclosed information. We take seriously the responsibility to exclude children from direct access to our Services, except for the core value proposition of our Platform, which is meant exclusively for children. We will not accept

their information for the purposes of opening a CG Slate account. It is however, ultimately the responsibility of parents or guardians to monitor their children's Internet activities including where appropriate by using Internet screening software. Remember to always log out of your account when you have completed your time on the application. This is particularly important if you share a device with another person. You are responsible for the security of and access to your own computer, mobile device or any other handset used to access the website/application. Ultimately, you are solely responsible for maintaining the secrecy of your username, password and any account information. Please be careful whenever using the Internet and the CG Slate Platform.

## **8. ACCESSING AND MANAGING YOUR INFORMATION**

- A. You may access the Personal Information collected by CG Slate by following the "Profile" link on the application or by contacting us on the Customer Service hotline. We will give you access to your Personal Information in the manner requested if that is possible and within a reasonable period. If we refuse your request or cannot give you access in the manner you have requested, we will do what we can to meet your requirements by other means. We may not be required to give you access to your Personal Information in certain circumstances which are set out in the applicable laws including where it may have an unreasonable impact on other individual's privacy. If we refuse access for such reasons, we will advise you in writing of the refusal and our reasons and the redressal mechanisms available to you.
- B. CG Slate takes reasonable measures to ensure that Personal Information which it collects is accurate, complete and current and also when it uses and discloses it, that it is relevant, having regard to the purpose for which it is being used or disclosed. We will take reasonable measures to correct Personal Information if we are satisfied that it should be corrected. We may contact with you on a periodic basis to seek the most up to date information from you. If you believe that the Personal Information CG Slate holds about you is inaccurate, incomplete or not current, please let CG Slate know and we will correct it if we are satisfied that a correction is required. Personal Information can be updated or corrected by you in the "Edit Profile" section on the application. Subject to identity verification, Personal Information can also be updated or corrected by calling CG Slate Customer Service hotline.

## **9. LAW, OUR RIGHTS AND PROTECTION**

- A. We access, preserve, and share your information described in the Information We Collect section of this Privacy Policy above if we have a good-faith belief that it is necessary to: (a) respond pursuant to applicable law or regulations, legal process, or government requests; (b) enforce Our Terms and any other applicable terms and policies, including for investigations of potential violations; (c) detect, investigate, prevent, or address fraud and other illegal activity or security, and technical issues; or (d) protect the rights, property, and safety of Our Users, CG Slate Platform or others, including to prevent death or imminent bodily harm.

## **10. UPDATES TO OUR PRIVACY POLICY**

- B. We may amend or update our Privacy Policy. We will provide You notice of amendments to this Privacy Policy, as appropriate, and update the last modified date at the top of this Privacy Policy. Please review Our Privacy Policy from time to time.
- C. If You have questions or issues about Our Privacy Policy, please contact us at [hello@cgslate.com](mailto:hello@cgslate.com).

## 11. DEFINITIONS

**Key Definitions:** For the purposes of this Privacy Policy, Terms and other policies of CG Slate, unless the context otherwise requires:

- A. **“Account”**- shall mean the account created on the Platform by the user and/or on behalf of the Child User for the use of the Services.
- B. **“Child User”**- means a minor under the age of 18 (eighteen) years who shall only use the Services and/or provide information for use of the Services and the CG Slate Platform with the prior consent, knowledge and agreement of their parent or legal guardian to the Privacy Policy and the Terms and such other terms and conditions, as may be applicable to CG Slate, the Website, Platform, products or Services.
- C. **“Information”**- shall mean collectively the Non-Personal Information and Personal Information (as defined herein)
- D. **“Personal Information”**- means any information relating to the Users and/or Child Users which, either directly or indirectly, in combination with other information available or likely to be available with CG Slate is capable of identifying such Users and/or Child Users. Personal Information shall include, for example, name, gender, mobile phone number, email ID, sensors data - accelerometer, gravity, gyroscope, magnetic field, pressure, proximity, location and rotation.
- E. **“Platform”**- shall mean the CG Slate application and the CG Slate tablet and shall include an and all associates applications, software, firmware, websites, products and Services that are connected to the Platform.
- F. **“Services”**- shall mean the following:
- Providing a Platform for pre-primary and primary education, including various videos, books, apps etc.;
  - Incentivizing Child User’s on the Platform with two in-app currencies based on the amount they have learned, viz. ‘Play Zone Minutes’ and ‘Shop Zone Coins’. While ‘Play Zone Minutes’ enables User and/or on behalf of the Child User to access entertainment content in the ‘Play Zone’, ‘Shop Zone Coins’ allow them to ‘favourite’ their favourite toys/games/books, which the parent/guardian can then use to buy the said items at a discount/cashback that is proportional to the number of ‘Coins’ earned. The conversions to said currencies, the logic behind these, and the earned cashbacks are all solely at the discretion of CG Slate, and the User and/or on behalf of the Child User agrees to explicitly abide by any decisions of CG Slate in this matter.
  - offers cashbacks for items purchased through the Shop Zone. These cashbacks are credited directly to the User’s PayTM accounts, and they would be asked to provide the details for the same. In the case that the User fail to do so, the User automatically stands disqualified from receiving such cashbacks. The time, value and the conditions concerning such cashbacks are dependent on the vendors/merchants associated with Shop Zone, and hence, are outside the control of CG Slate. User agrees to clarify these terms and accepts to be bound by these. CG Slate makes no guarantees or promises in this regard.

**“User”** (or ‘you’, ‘your’ and ‘yourself’)- means any user of the Services who is aged 18 (eighteen) years or above or, where applicable, is the parent or legal guardian of a Child User.